

243125

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Northern Division**

MANOR CARE OF AMERICA, INC.

Plaintiff,

v.

PROPERTY & CASUALTY INSURANCE
GUARANTY CORPORATION,

Defendant.

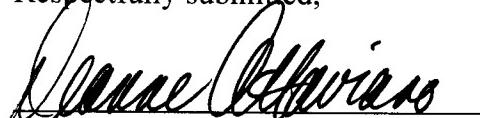
Civil Action No.
02-CV-04206 (BEL)

JOINT STATUS REPORT

On December 1, 2006, the parties filed a Joint Status Report. In that Report the plaintiff indicated that it intended to provide certain requested information to the defendant by December 15, 2006. The plaintiff has not yet been able to provide this information to the defendant. The defendant has requested the plaintiff to produce various corporate documents concerning numerous corporate entities during the period 1993 – 1997. The plaintiff has worked diligently on obtaining this information but has not completed its search of its records. Because the records are 10 – 14 years old, the plaintiff's search for these records has been complicated and burdensome. The plaintiff now anticipates that records that are available during that time period will be provided to defense counsel by February 28, 2007. Upon receipt of that information, the defendant will advise the plaintiff of those claims they are honoring and those they are denying by April 2, 2007. By April 16, 2007, the parties will report to the Court as to a future discovery

plan in order to resolve the underlying disputed claims. The parties anticipate that the unresolved disputed claims will then be subject to summary judgment or trial.

Respectfully submitted,



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SO APPROVED:

The Honorable Benson E. Legg, Judge

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 1st day of February, 2007, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system



Deanne M. Ottaviano, Bar No. 15659